## Afton Communications Corp. 5352 Cloverdale Road Roanoke, VA 24019 (540) 977-2400

March 1, 2019

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification

Name of company/entity covered by this certification: Afton Communications Corp.

Form 499 Filer ID: 819124

Name of signatory: Edward Clark, Jr.

Title of signatory: President

I, Edward W. Clark Jr., certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not been involved or named in any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) involving data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

## Afton Communications Corp. Certification Statement of Compliance

Afton Communications Corp. ("Afton") provides analog one way voice paging services. Customer records are secured in a locked accounting department. Computer access to all customer information is available to appropriate personnel as authorized by security protocol.

Afton currently does not use, disclose, or permit access to CPNI for marketing of any sort, or for any purpose requiring prior customer approval. Nor does Afton provide information available for sale or use by any outside company pertaining to Afton's data base of customer information. Should Afton change this policy, it will update its CPNI compliance policies consistent with Commission rules. Afton employees with access to CPNI have been trained as to when they are and are not authorized to use CPNI, and Afton has an express disciplinary process in place.

Afton properly authenticates customers prior to disclosing CPNI based on customer-initiated telephone contact or an in-store visit. As a paging provider, however, Afton does not maintain call detail information. Also, CPNI is not made available in any form online via the Internet. For in-store visits a valid photo ID is required to disclose CPNI. Customers are notified immediately when an address of record is created or changed.

All records are secured as well as any information pertaining to the customer accounts. There has been no access authorized or unauthorized by any parties to obtain any customer information, including CPNI. Nevertheless, policies are in place to ensure that law enforcement and affected customers are timely notified of a breach of its customers' CPNI as the Commission's rules require.